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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 BRYAN HUMAN, an individual,)
11)
Plaintiff,)
12 vs.)
13)
GEICO INSURANCE AGENCY, INC..)
14 DOES I-X; and ROE CORPORATIONS I-X) inclusive
15)
16 Defendants.)
_____)
17

CASE NO.: 2:21-cv-00166

**STIPULATION AND ORDER TO
EXTEND REBUTTAL EXPERT
DEADLINE (Third Request)**

18 Pursuant to LR IA 6-1 and LR 26-3 and FRCP 26, the parties, by and through their
19 respective counsel, respectfully submit this stipulation for extension the rebuttal expert
20 disclosure deadline by a period of seven days. Counsel for the parties have conferred regarding
21 this matter and agree that an extension of discovery in this case is appropriate and necessary for
22 litigation efficiency. **The parties herein request an extension of the rebuttal expert**
23 **disclosure deadlines by 7 days. The parties do not seek the extension or continuance of any**
24 **other dates.**
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1 **1. Discovery Completed to Date**

2 At this time, all parties have exchanged initial and supplemental disclosures. The parties
3 have propounded written discovery in the form of interrogatories, admissions, and requests for
4 production of documents. The parties have engaged in deposition discovery and have exchanged
5 initial expert disclosures.
6

7 **2. Discovery That Remains to be Completed**

8 The parties must exchange rebuttal expert disclosures, complete deposition discovery and
9 generally complete remaining discovery and supplementation as needed.
10

11 **3. Reasons Why Discovery Remaining Has Not Been Completed Within the**
12 **Time Limits of the Court's Prior Order**

13 The request to extend the rebuttal expert disclosure was made by plaintiff who has a
14 retained expert whose key employee suffered an illness requiring absence from work causing the
15 expert to devote more time than usual to his clinic and delayed work on rebuttal reporting. The
16 defendant agrees to the extension provided that the extension is mutual and applies also to
17 defendant's experts, to which the plaintiff agrees.
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1 **4. Proposed Schedule for Completion of Outstanding Discovery**

2 The parties respectfully propose the following discovery deadlines:

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<u>Event</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Last day to add parties or amend pleadings	CLOSED	CLOSED
Initial Expert Disclosures	March 8, 2022	CLOSED
Rebuttal Expert Disclosures	April 8, 2022	April 15, 2022
Close of Discovery	May 6, 2022	(Unchanged)
Dispositive Motions Deadline	June 6, 2022	(Unchanged)

10

11

12 DATED this 8th day of April, 2022.

12 DATED this 8th day of April, 2022.

13 STOVALL & ASSOCIATES

13 WINNER AND SHERROD

14

15 /s/ Ross Moynihan

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15 /s/Lara L. Miller

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Attorney for Defendant

ORDER

The Court having reviewed the stipulation to extend rebuttal expert deadlines in this matter, is hereby ordered that the stipulation is approved. The proposed deadlines set forth under paragraph 4 of the stipulation shall govern future discovery in this case. A separate Order shall not be issued.

IT IS SO ORDERED this 8th day of April, 2022.


U.S. MAGISTRATE JUDGE

Submitted by:
STOVALL & ASSOCIATES

/s/ Ross Moynihan

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